



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 29, 2006

Kirk Adams, Treasurer
Arizona Republican Party
3501 North 24th Street
Phoenix, AZ 85016

Response Due Date:
January 2, 2007

Identification Number: C00008227

Reference: Amended August Monthly Report (7/1/06-7/31/06), received 11/6/06

Dear Mr. Adams:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule H6 discloses \$25,340.92 in memo entries for apparent allocable Federal Election Activity ("FEA") in which it appears the Levin account originally paid for the entire expense(s), as disclosed on Schedule L-B supporting Line 5. The federal share of these memo entries total \$5,321.60. The Commission notes the transfer-out of the federal share to the Levin account on your October Monthly Report.

Please be advised, all disbursements, contributions, and expenditures made wholly or in part in connection with Federal elections **must be made entirely from the Federal account**, and not from any non-Federal account. 11 CFR §§102.5(a)(1)(i), 300.30(b)(1) and (3)(iii) If your committee chooses to have one or more separate allocation accounts, which must be treated as Federal accounts for reporting purposes, all disbursements, contributions, and expenditures made wholly or in part in connection with Federal elections must be made entirely from this separate allocation account, and not from any non-Federal account. 11 CFR §§102.5(a)(1)(i) and (5), 300.30(b)(4) However, the non-Federal account or Levin account is permitted to transfer its share of allocable expenditures or disbursements for FEA to the Federal or separate allocation account pursuant to 11 CFR §300.33.

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Note, these transfers for allocable Federal Election Activity must not exceed the Levin share of the allocable expenses and must be made within a 70-day time period: no more than 10 days before and no more than 60 days after the payments to the vendors are made from the Federal or allocation account. Exception: transfers may be made more than 10 days if advance payment is required by the vendor(s) and such payment is based on a reasonable estimate of the activity's final costs as determined by the committee and the vendor(s) involved. 11 CFR §300.33(d)(2)

Please clarify the procedures you are currently using to pay for allocable FEA expenses. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations for FEA.

Although the Commission may take further legal action regarding this prohibited activity, your prompt action will be taken into consideration.

-Schedule B supporting Line 21(b) of your report discloses a voided or returned check(s) for an expenditure(s) made during this or a previous reporting period. Please clarify if and when this check(s) was reissued. If it was not reissued, please clarify the steps your committee has taken in order to avoid the acceptance of a prohibited in-kind contribution(s).

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division

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